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*Attorneys for Defendant*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

ELIZABETH POOLE, as Individual Assignee of  
Rights of RENE ARGUELLES JR.,

Plaintiff,

vs.

PROGRESSIVE DIRECT INSURANCE  
COMPANY, an Ohio Corporation; DOES 1-10, and  
ROE CORPORATIONS 1-10, inclusive,

Defendants.

Case No: 2:24-cv-01981-CDS-BNW

**STIPULATION AND ORDER TO  
EXTEND BRIEFING DEADLINE  
(First Request)**

[ECF No. 10]

**STIPULATION AND ORDER TO EXTEND BRIEFING DEADLINE**

Plaintiff Elizabeth Poole, by and through her attorneys of record, BROCK K. OHLSON PLLC,  
and Defendant Progressive Direct Insurance Company, by and through its attorneys of record,  
BARRON & PRUITT, LLP, hereby agree and stipulate to extend the deadline for Defendant  
Progressive Direct Insurance Company to file a Response to Plaintiff's Motion to Remand (Docket  
#8).

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Plaintiff's Motion to Remand was filed on November 22, 2024, with a Response currently due December 6, 2024. Plaintiff does not oppose Defendant Progressive Direct Insurance Company's request for an extension up to and including December 13, 2024 to allow Defendant Progressive Direct Insurance Company to file a response to said motion. Additional time is needed due to time off for the Thanksgiving holiday, as well as impediments relating to Counsel's preparation and attendance for an arbitration hearing in another matter.

Dated this 6<sup>th</sup> day of December, 2024

BARRON & PRUITT, LLP

/s/ William H. Pruitt  
 WILLIAM H. PRUITT, ESQ.  
 Nevada Bar No. 6783  
 3890 West Ann Road  
 North Las Vegas, Nevada 89031  
*Attorneys for Defendant*

Dated this 6<sup>th</sup> day of December, 2024

BROCK R. OHLSON PLLC

Justin A. Corne  
 JUSTIN A. CORNE, ESQ.  
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 6060 Elton Avenue  
 Las Vegas, Nevada 89107  
*Attorneys for Plaintiff*

IT IS SO ORDERED:

Cristina D. Silva  
 Cristina D. Silva  
 United States District Judge

Dated: December 6, 2024

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